

Fill in this information to identify the case:

Debtor 1 Rainee S. Kirkland

Debtor 2
(Spouse, if filing)

United States Bankruptcy Court for the: Western District of PA

Case number 19-23268 CMB

Form 4100R

Response to Notice of Final Cure Payment

10/15

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

Part 1: Mortgage Information

Name of Creditor: Freedom Mortgage Corporation Court claim no. (if known): 21

Last 4 digits of any number you use to identify the debtor's account: 5013

Property address:

112 Harden Avenue
Duquesne, PA 15110

Part 2: Prepetition Default Payments

Check one:

Creditor agrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim.

Creditor disagrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. Creditor asserts that the total prepetition amount remaining unpaid as of the date of this response is: \$ _____

Part 3: Postpetition Mortgage Payment

Check one:

Creditor states that the debtor(s) are current with all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

The next postpetition payment from the debtor(s) is due on: 02 / 01 / 2025

Creditor states that the debtor(s) are not current on all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as of the date of this response is:

a. Total postpetition ongoing payments due: (a) \$ _____

b. Total fees, charges, expenses, escrow, and costs outstanding: + (b) \$ _____

c. **Total.** Add lines a and b. (c) \$ _____

Creditor asserts that the debtor(s) are contractually obligated for the postpetition payment(s) that first became due on:

Debtor(s) Rainee S. Kirkland
First Name Middle Name Last Name

Case Number (if known): 19-23268 CMB

Part 4: Itemized Payment History

If the creditor disagrees in Part 2 that the prepetition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all postpetition payments, including all fees, charges, expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- all payments received;
- all fees, costs, escrow, and expenses assessed to the mortgage; and
- all amounts the creditor contends remain unpaid.

Part 5: Sign Here

The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim.

Check the appropriate box::

I am the creditor.
 I am the creditor's authorized agent.

I declare under penalty of perjury that the information provided in this response is true and correct to the best of my knowledge, information, and reasonable belief.

Sign and print your name and your title, if any, and state your address and telephone number if different from the notice address listed on the proof of claim to which this response applies.

x/s/ Brent J. Lemon

Date 02/04/2025

Brent Lemon
04 Feb 2025, 12:20:45, EST

KML Law Group, P.C.
701 Market Street, Suite 5000
Philadelphia, PA 16106
215-627-1322
bkgroup@kmlawgroup.com
Attorney for Creditor

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE: Rainee S. Kirkland
Debtor(s)
Freedom Mortgage Corporation
Movant
vs.
Rainee S. Kirkland
Debtor(s)
Ronda J. Winnecur,
Trustee

BK NO. 19-23268 CMB
Chapter 13
Related to Claim No. 21

**CERTIFICATE OF SERVICE
RESPONSE TO NOTICE OF FINAL CURE MORTGAGE PAYMENT**

I, Brent J. Lemon of KML Law Group, P.C., certify that I am, and at all times hereinafter mentioned was, more than 18 years of age and that on February 7, 2025, I served the above captioned pleading, filed in the proceeding on the parties at the addresses shown below:

Debtor(s)
Rainee S. Kirkland
112 Harden Avenue
Duquesne, PA 15110

Attorney for Debtor(s) (via ECF)
Kenneth Steidl, Esq.
707 Grant Street
Suite 2830, Gulf Tower
Pittsburgh, PA 15219

Trustee (via ECF)
Ronda J. Winnecur
Suite 3250, USX Tower
600 Grant Street
Pittsburgh, PA 15219

Method of Service: electronic means or first-class mail

Dated: February 7, 2025

/s/ Brent J. Lemon
Brent J. Lemon
Attorney I.D. 86478
KML Law Group, P.C.
BNY Mellon Independence Center
701 Market Street, Suite 5000
Philadelphia, PA 19106
(412) 475-8764
blemon@kmllawgroup.com